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Before the  
Federal Communications Commission  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Advanced Television Systems )  
and Their Impact upon the )  
Existing Television Broadcast )  
Service )

MM Docket No. 87-268

ORIGINAL  
FILE

**FURTHER COMMENTS OF THE**  
**UNITED STATES ADVANCED TELEVISION SYSTEMS COMMITTEE**  
**(ATSC)**

The United States Advanced Television Systems Committee (hereinafter "ATSC") hereby files further comments on the Second Report and Order/Further Notice of Proposed Rule Making released May 8, 1992 ("Order/FNPRM"). The ATSC previously filed brief comments regarding the single issue of "Coordination of ATV Standards Activities" on June 5, 1992.

The ATSC was established in late 1982 by the Joint Committee on Inter-Society Coordination (JCIC) to coordinate and develop voluntary national technical standards for advanced television systems. The JCIC members — the Electronic Industries Association, the Institute of Electrical and Electronics Engineers, the National Association of Broadcasters, the National Cable Television Association, and the Society of Motion Picture and Television Engineers — are Charter Members of the ATSC. More than fifty corporations, companies, television networks, associations and universities are members of the ATSC and cooperate in the work of the organization. As such, the ATSC is broadly representative of virtually all facets of the United States television, motion picture, and electronics industries on the specific topic of Advanced Television (ATV). ATSC has participated in this Docket for the past five years.

In the Order/FNPRM, the Commission raised a number of new questions related to the establishment of an ATV system in the United States.<sup>1</sup> Most of these questions relate specifically to licensees and operators of television broadcasting stations and networks; and, comments from those affected parties will be most instructive to the Commission.

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<sup>1</sup> See, for example, Order/FNPRM at 3 and APPENDIX B.

The ATSC, both through its own filed comments and through those of its television broadcast members, has played an active role at each stage of this proceeding. ATSC continues this practice for this round of comments and fully supports the comments being filed in this proceeding as "Joint Broadcaster Comments." Specifically, the ATSC would draw the Commission's attention to the "Joint Broadcaster Comments" related to the issues listed below. They are stated here as they were presented by the Commission in its Order/FNPRM:

- A proposal to rank the class of parties initially eligible for ATV frequencies in the event of a spectrum shortfall as follows: (a) licensees and permittees with constructed facilities and program test authority, (b) permittees with unbuilt facilities, and (c) applicants;
- A proposal to allow broadcasters a period of time to negotiate channel assignments prior to adoption of a Table of Allotments and, where broadcasters are unable to agree, to make channels available on a first-come, first-served basis;
- A proposal to temporarily suspend the dual network rule to permit networks to give their affiliates a second feed for ATV;
- A proposal to require low-power television service stations to convert to ATV at the point that full-service broadcast stations will be required to do so;
- The Commission's tentative conclusions that (a) it should establish a firm date for conversion to ATV that is 15 years from either selection of an ATV system or the date a Table of ATV allotments is effective, whichever is later, and (b) that the Commission should review, in 1998, the propriety of the conversion date it will have set;
- The Commission's tentative conclusion that it should impose a 100 percent simulcasting requirement no later than four years after the ATV application-construction period has passed, and on proposals for affording broadcasters some initial flexibility, including a proposal to "phase in" a full simulcasting requirement in two stages.

## **Extensibility Issues**

The ATSC previously filed an Ex Parte presentation in this Docket<sup>2</sup> in which we shared with the Commission the findings of our Technology Group on Distribution (chaired by Mr. Daniel R. Wells of Comsat Corporation) related to certain audio aspects of ATV as well as other ancillary data services. The Commission has recognized those findings and has correctly directed the Advisory Committee to address the findings in the ATSC document in its selection of an ATV system.<sup>3</sup> The ATSC is gratified that the Commission has taken these steps.

The Advisory Committee has already moved to address this issue. Specifically, Working Party 1 of the Planning Subcommittee of the Advisory Committee, under the chairmanship of Mr. Renville H. McMann, Jr., has been assigned the initial responsibility to consider the ATSC document related to audio and ancillary services. As this working party is responsible for determining the various "attributes" of the proposed advanced television systems, the ATSC findings will receive a fair "peer review" from the expert members of this group.

Additionally, it is anticipated that the Systems Subcommittee's Working Party 4, chaired by Dr. Robert Hopkins<sup>4</sup>, will soon receive the report of Mr. McMann's group concerning this matter. This working party is responsible for reviewing the performance of all proponent systems, analyzing the systems with regard to the selection criteria, and preparing this information for the final selection of an ATV system by the Commission. It is therefore clear that the Commission's desires that the Advisory Committee address issues raised in the ATSC's Ex Parte filing are being promptly dealt with and will be satisfactorily resolved.

## **New Developments**

The ATSC fully supports the very active role taken by the Advisory Committee in reviewing the current state of advanced television technology. Additionally, the ATSC agrees completely with the conclusions reached by the Advisory Committee in its Fifth Interim Report that there is no need to reopen the testing process at this time to consider any new developments in the state of the art of these technologies. Indeed, the development of compressed digital high definition television here in the United States is a remarkable feat and is at the

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<sup>2</sup> Ex Parte Filing in MM Docket No. 87-268, United States Advanced Television Systems Committee, February 5, 1992.

<sup>3</sup> Order/FNPRM at 79.

<sup>4</sup> Dr. Hopkins is also the Executive Director of the ATSC and is intimately familiar with the audio and ancillary data work under discussion here.

forefront of historic technological importance. The Commission's proceedings have, in fact, pushed the outer reaches of television technology to remarkable new limits.<sup>5</sup>

### **Related Issues**

Finally, the ATSC would call the Commission's attention to its previously filed Comments concerning "Coordination of ATV Standards Activities." A copy of that document has been provided to the Chairman of the Advisory Committee as well.

As soon as the Advisory Committee is in a position to recommend the "winning system" to the Commission, the ATSC intends to move forward with the detailed standards work outlined in its previous filing. We are confident that the work can be completed in a timely fashion for inclusion in the Commission's final Report and Order in which it will select an ATV system for the United States. It is our intention to work closely with the Advisory Committee and with the Commission's staff to ensure that sufficient data is provided to appropriately document the technical standard in the Commission's Rules, in Commission technical publications, or elsewhere as appropriate.

Respectfully submitted,

**United States Advanced  
Television Systems Committee**  
1776 K Street NW, Suite 300  
Washington, DC 20006

  
James C. McKinney  
Chairman

July 15, 1992

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<sup>5</sup> ATSC is aware of recent developments in Europe and elsewhere concerning the modulation technique known as COFDM which is being explored for both Digital Audio Broadcasting and for television. It is presently being studied in Sweden (where it is used in "HD-DIVINE") and in Canada, France, Germany, the United Kingdom and elsewhere. COFDM is one component technology which the Commission may wish to monitor as it continues its selection process.